

3

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

United States of America,

Plaintiff,

v.

D-1 Conor Freeman
D-2 Ricky Handschumacher
D-3 Colton Jurisic
D-4 Reyad Gafar Abbas
D-5 Garrett Endicott
D-6 Ryan Stevenson,

Defendant.

Case:2:19-cr-20246
Judge: Hood, Denise Page
MJ: Patti, Anthony P.
Filed: 04-18-2019 At 04:44 PM
SEALED MATTER (dat)

**GOVERNMENT'S MOTION AND SUPPORTING BRIEF
TO SEAL INDICTMENT, ARREST WARRANTS, THIS MOTION,
AND ANY ENSUING ORDER**

The United States of America hereby moves for an order sealing the
Indictment, arrest warrants, this Motion, and any ensuing order in this case and
states:

1. The Indictment in this case charges the defendants with one or more federal crimes.
2. Rule 6(e)(4) of the Federal Rules of Criminal Procedure provides:

(4) Sealed Indictment. The magistrate judge to whom an indictment is returned may direct that the indictment be kept secret until the defendant is

in custody or has been released pending trial. The clerk must then seal the indictment, and no person may disclose the indictment's existence except as necessary to issue or execute a warrant or summons.

Fed.R.Crim.P. 6(e)(4).

3. D-1 Conor Freeman does not reside in the United States. Public disclosure of the Indictment, the arrest warrant, or this Motion and any ensuing order could jeopardize the United States' efforts to arrest and extradite the defendant from his country of residence or other countries where he might travel. The government is concerned that the defendants may attempt to flee, destroy evidence, or intimidate witnesses if the Indictment, arrest warrants, or this Motion and any ensuing order become a matter of public record before the defendants are arrested.
4. Accordingly, the government requests that the Indictment, arrest warrants, this Motion, and the ensuing order be sealed until further order of this Court, except that the government may disclose these materials to law enforcement personnel, including foreign authorities, for the limited purpose of facilitating the arrest of the defendant and/or his extradition to the United States.

WHEREFORE, the government requests this Court to issue an order sealing the Indictment, arrest warrant, this Motion, and any ensuing order, but authorizing the government to disclose these materials to law enforcement

personnel, including foreign authorities, for the limited purpose of facilitating the arrest of the defendant and/or his extradition to the United States.


Respectfully submitted,

MATTHEW SCHNEIDER
United States Attorney

/s/ Timothy J. Wyse
Timothy J. Wyse
Assistant United States Attorney
211 W. Fort Street, Suite 2001
Detroit, MI 48226
Timothy.Wyse@usdoj.gov
(313) 226-9144

Dated: April 18, 2019

IT IS SO ORDERED.



David R. Grand
United States Magistrate Judge

Entered: 4/18/19